

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

FILED  
DEC 3 2013

CLERK, U.S. DISTRICT COURT  
By ada Deputy

UNITED STATES OF AMERICA

FILED UNDER SEAL

v.

No.

**SEALED**

THEODORE E. OKECHUKU (01) §  
IGNATIUS O. EZENAGU (02) §  
EMMANUEL C. IWUOHA (03) §  
ELECHI N. OTI (04) §  
DAVID L. REED (05) §  
JERRY K. REED (06) §  
KELVIN L. RUTLEDGE (07) §

**3-13CR 481-P**

INDICTMENT

The Grand Jury Charges:

Count One

Conspiracy to Unlawfully Distribute a Controlled Substance  
(Violation of 21 U.S.C. § 846 (21 U.S.C. § 841))

Beginning on or about January 2012, the exact date being unknown to the Grand Jury, and continuing to the present, in the Dallas Division of the Northern District of Texas, and elsewhere, the defendants, **Theodore Okechuku, Ignatius Ezenagu, Emmanuel Iwuoha, Elechi Oti, David Reed, Jerry Reed, and Kelvin Rutledge**, did knowingly, intentionally and unlawfully combine, conspire, confederate, and agree together, and with persons known and unknown to the Grand Jury, to distribute and dispense hydrocodone, a Schedule III controlled substance, outside the scope of professional practice and not with a legitimate medical purpose, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(E)(i).

In violation of 21 U.S.C § 846.

Forfeiture Notice  
(21 U.S.C. § 853(a))

Upon conviction for the offense alleged in Count One of this Indictment, the defendants, **Theodore Okechuku, Ignatius Ezenagu, Emmanuel Iwuoha, Elechi Oti, David Reed, Jerry Reed, and Kelvin Rutledge**, shall forfeit to the United States all property, real or personal, constituting, or derived from, the proceeds obtained, directly or indirectly, as a result of the offense; and any property, real or personal, used or intended to be used, in any manner or part, to commit or to facilitate the commission of the offense. This property includes, but is not limited to, the following:

1. The total proceeds obtained, directly or indirectly, as a result of the offense (commonly referred to as a “money judgment”).  
[sought from **all defendants**]

The following items were derived from the proceeds of the offense (and their government-recognized value should be applied to the money judgment):

2. \$10,419.55 in funds seized from Bank of America Account #XXXXXXXXX0799 and Account # XXXXXXXXX5228 in the name of Theodore Okechuku, MD.  
[sought from **Theodore Okechuku**]
3. \$68,967.38 in funds seized from Bank of America account XXXXXXXXX1033 in the name of Medical Rehabilitation Clinic, Inc.  
[sought from **Theodore Okechuku**]

Pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b), if any of the above-referenced property subject to forfeiture, as a result of any act or omission of a defendant, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or

Indictment – Page 2

has been commingled with other property which cannot be subdivided without difficulty, it is the intent of the United States to seek forfeiture of other property of that defendant up to the value of the property subject to forfeiture.

A TRUE BILL

  
FOREPERSON

SARAH R. SALDAÑA  
UNITED STATES ATTORNEY

  
KATHERINE E. PFEIFLE

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THE UNITED STATES OF AMERICA

v.

THEODORE E. OKECHUKU (01)  
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8-13 CR 481-P

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SEALED INDICTMENT

21 U.S.C. § 846 (21 U.S.C. § 841)  
Conspiracy to Unlawfully Distribute a Controlled Substance

21 U.S.C. § 853 (a)  
Forfeiture Notice

1 Counts

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A true bill rendered

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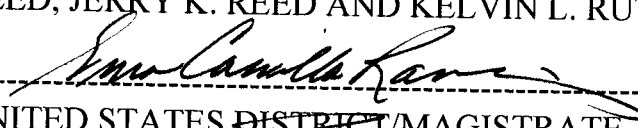
DALLAS

  
FOREPERSON

Filed in open court this 3RD day of December, 2013.

  
Clerk

**WARRANT TO ISSUE FOR THE FOLLOWING:** THEODORE E. OKECHUKU, IGNATIUS O. EZENAGU, EMMANUEL C. IWUOHA, ELECHI N. OTI, DAVID L. REED, JERRY K. REED AND KELVIN L. RUTLEDGE.

  
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UNITED STATES ~~DISTRICT~~/MAGISTRATE JUDGE

No Criminal Complaint Magistrate Case Pending

No Magistrate Case Pending